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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KALIEN FRAZIER, on behalf of himself and
others similarly situated,

Plaintiff,

vs.

U.S. BANK NATIONAL ASSOCIATION, and
DOES 1 to 100, inclusive,

Defendant.

Case No. 4:23-cv-05675

**JOINT STIPULATION OF DISMISSAL AND
[PROPOSED] ORDER OF DISMISSAL
WITHOUT PREJUDICE**

Judge: Hon. Jon S. Tigar

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KALIEN FRAZIER

STIPULATION TO DIMISS

Plaintiff KALIEN FRAZIER (“Plaintiff”) and Defendant U.S. BANK NATIONAL ASSOCIATION (“Defendant”) (collectively, the “Parties”), by and through their respective, undersigned counsel, hereby jointly stipulate and agree that Kalien Frazier hereby dismisses without prejudice the entire action and all claims being asserted against Defendant in the above-captioned action pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. Each side shall bear its own costs and attorneys’ fees.

WHEREFORE, the Parties hereby request that the Court dismiss this case without prejudice, with each Party to bear his or its own costs and attorneys’ fees.

IT IS SO STIPULATED.

Dated: June 4, 2024

LAVI & EBRAHIMIAN, LLP

By: /s/ Cassandra Castro

Joseph Lavi
Vincent C. Granberry
Cassandra Castro
Attorneys for Plaintiff
KALIEN FRAZIER

Dated: June 4, 2024

WINSTON & STRAWN LLP

By: /s/ Emilie C. Woodhead

Joan B. Tucker Fife
Emilie C. Woodhead
Winston K. Hu
Attorneys for Defendant
U.S. BANK NATIONAL ASSOCIATION

ATTESTATION PURSUANT TO LOCAL RULE 5-1 (i)(3)

Pursuant to Local Rule 5-1 (i)(3), regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

Dated: June 4, 2024

/s/Emilie C. Woodhead

Emilie C. Woodhead


~~PROPOSED~~ ORDER OF DISMISSAL

Pursuant to the Stipulation of all Parties who have appeared in the action and good cause appearing, the Court ORDERS the following:

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, this action and all claims asserted in the above-captioned action by Plaintiff against the Defendant are DISMISSED WITHOUT PREJUDICE. Each party shall bear its own costs and attorneys' fees. The Clerk of the Court is directed to close the case.

IT IS SO ORDERED.

Dated: June 5, 2024



Honorable Jon S. Tigar
United States District Court Judge